

## **REMARKS**

In response to the Office Action mailed February 5, 2003, Applicant respectfully requests reconsideration of this application, as amended, and consideration of the following remarks.

### **Common Ownership**

The present application and U.S. Patent No. 6,408,3551 were both owned by Sony Corporation at the time the invention of the present application was made.

### **Amendments**

#### ***Revisions to the Title***

The Examiner stated that the originally submitted title of the invention is non-descriptive, and required a new title. Accordingly, Applicant has revised the title to read MAINTAINING COMMUNICATIONS IN A BUS BRIDGE INTERCONNECT.

#### ***Revisions to the Specification and Drawings***

Applicant has amended the specification to correct instances of typographical errors that introduced inconsistencies in the terminology of the description of the invention. No new matter has been added.

Applicant also is submitting herewith a Request for Drawing Correction for Figure 10.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 102(e)***

#### **Claims 1-20**

Claims 1-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Toguchi, U.S. Patent No. 6,408,355. Applicant does not admit that Toguchi is prior art and reserves the right to swear behind the reference at a later date. Nonetheless, Applicant believes that the present invention is distinguishable over Toguchi because Toguchi does not disclose each and every element of the invention as claimed in claims 1-20.

Toguchi discloses a method to release the settings for isochronous transactions, such as bandwidth, in a bus network when the sending and receiving nodes are not on the same bus. Toguchi discloses several exemplary bus network topologies to which his invention may be applied, such as illustrated in Figures 2A-C, 3A-B and 4A-B.

The Examiner appears to be equating Toguchi's bus identifier (bus ID) with Applicant's node EUI as claimed in claims 1-20. However EUI (Extended Unique Identifier) and bus ID are terms of art in communications technology for identifiers that have different characteristics. In particular, a bus ID is assigned each time the time the bus is initialized and is subject to change when the topology of the bus network changes. In contrast, an EUI is assigned by the manufacturer of a node and is fixed for each node, regardless of the bus to which the node is attached. For an IEEE 1394 bus, the Request for Comment (RFC) 2734 for *IPv4 over IEEE 1394*, December 1999 (available at <ftp://ftp.isi.edu/in-notes/rfc2734.txt>), defines a bus ID as

a 10-bit number that uniquely identifies a particular bus within a group of multiple interconnected buses. The bus ID is the most significant portion of a node's 16-bit node ID. The value 0x3FF designates the local bus.

An EUI (also known as a "node unique ID") is defined by RFC 2734 as

a 64-bit number that uniquely identifies a node among all the Serial Bus nodes manufactured worldwide.

Additionally, it is well-known that a "node ID" not the same as a "node unique ID" for an IEEE 1394 bus. RFC 2734 defines a node ID as

a 16-bit number that uniquely identifies a Serial Bus node within a group of multiple interconnected buses. The most significant ten bits are the bus ID and the least significant six bits are the physical ID.

Applicant has used these terms consistently with their accepted meanings in both the claims and the specification. Thus, Toguchi's bus ID cannot be properly interpreted as teaching Applicant's EUI as claimed in claims 1-20.

Furthermore with regard to claims 1-6, 15 and 18, the Examiner has relied on Figures 2 and 3 (the Examiner did not indicate which of Figures 2A-C or 3A-B) as teaching Applicant's limitation of "storing the updated listener nodeID with the listener node EUI" in the claims. The Examiner appears to be interpreting Toguchi as disclosing how communication is maintained between sending and receiving nodes when the bus

network topology changes from, for example, the topology shown in Figure 2B to the topology shown in Figures 3B. However, Toguchi merely describes the Figures as illustrative of different bus network topologies and does not support the Examiner's interpretation:

FIGS. 2A to 2C, 3A, 3B, 4A and 4B respectively show an example in which an owner 1, a talker 2 and a listener 3 are arranged in an IEEE-1394 bus network to which the present invention is applied. In FIG. 2A, the owner 1, the talker 2 and the listener 3 exist on the same bus 4.

Words, "isochronous resource manager (IRM)" 5, mean a isochronous transaction control node for controlling communication resources. To enable isochronous transaction, IRM 5 is required on the bus 4 in addition to the owner 1, the talker 2 and the listener 3. The above IRM 5 is automatically selected in bus configuration.

In FIG. 2B, the talker 2 and the listener 3 exist on the same bus 4 and the owner 1 exists on a bus 4 different from the above bus. The buses 4A, 4B are connected via a bridge 6. As shown in FIG. 2B, the bus 4 on which the owner 1 exists and the bus 4 on which the talker 2 and the listener 3 exists are adjacent. However, a case that other one or plural buses 4 exist between the above buses 4A, 4B is conceivable. As for adjacent buses 4A, 4B in FIGS. 2C, 3A, 3B, 4A and 4B, the situation is also the same.

In FIG. 2C, the owner 1 and the talker 2 exist on the same bus 4 and the listener 3 exists on a bus 4 different from the above bus.

In FIG. 3A, the owner 1 and the listener 3 exist on the same bus 4 and the talker 2 exists on a bus 4 different from the above bus. In FIG. 3B, the owner 1, the talker 2 and the listener 3 exist on each different bus 4 in the above order. The buses 4A, 4B, 4C are sequentially connected via each bridge 6.

In FIG. 4A, the owner 1, the listener 3 and the talker 2 exist on each different bus 4 in the above order. In FIG. 4B, the talker 2, the owner 1 and the listener 3 exist on each different bus 4 in the above order. [Toguchi: col. 4, line 61- col. 5, line 27]

Thus, neither Figures 2A-C and 3A-B, nor their corresponding descriptions cited above, can be properly interpreted as disclosing or even suggesting Applicant's claimed limitation in claims 1-6, 15 and 18.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1-20 is not anticipated by Toguchi under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

### SUMMARY

Claims 1-20 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

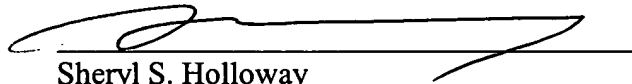
### Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

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